



DAVID R. BUCHANAN  
(973) 639-9100  
dbuchanan@seegerweiss.com

October 14, 2024

**VIA ECF**

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080**

Dear Judge Singh:

Further to the parties' submission of the agreed upon Plaintiff Fact Sheet ("PFS") for the Self-Funded Payer Track, and the proposed Case Management Order regarding the implementation of the PFS, Plaintiffs write to respectfully request that the Court enter a case management order to initiate master discovery. As the Court is no doubt aware, the parties previously submitted PFS implementation language as part of their competing submissions regarding master discovery (ECF Nos. 269, 270). Although that language is now moot, the remaining portions of those competing proposals—including those relating to limits on the number of discovery requests and timeframes for serving discovery responses—remain subject to the Court's continuing consideration. Plaintiffs have not yet served master discovery requests on Defendants as they await the Court's guidance in this regard. Plaintiffs therefore respectfully request that the Court enter a CMO providing for the service of master discovery requests simultaneously with its entry of the proposed PFS implementation order so that the master discovery process may proceed concurrently with the PFS process.

We thank the Court for its continued attention to this matter and are available to address this request at the Court's convenience.

Respectfully submitted,

s/ David R. Buchanan  
David R. Buchanan  
*Liaison Counsel for*  
*Self-Funded Payer Track*

cc: Counsel of Record (via ECF)